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TDS TELECOM®

ORIGINAL

Government and Regulatory Affairs

July 28, 1999

Ex Parte

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RECEIVED

JUL 29 1999

FCC MAIL ROOM

Re: CC Docket 80-286, In the Matter of Jurisdictional Separations Reform and Referral to the Federal-State Joint Board

Dear Mr. Caton:

On July 27, 1999, Jeff Jung, Mike Reed and the undersigned of TDS TELECOM discussed the attached charts with Peter Bluhm of the Federal-State Separations Joint Board via conference call. Specifically, TDS TELECOM used the charts to illustrate the need for a freeze of the separations factors. The first four charts provide information on the trends for interstate unweighted dial equipment minutes (DEM) from 1993-1998 for a sample of TDS TELECOM companies. The charts compare actual interstate unweighted DEM to interstate unweighted DEM if the separations factors are frozen based on a three year time period, a three year rolling average or a five year rolling average. The next four charts provide DEM per access line for the local, state and interstate jurisdictions from 1993-1998. The final chart displays the impact of Internet traffic on interstate DEM using three separate scenarios: (1) using existing separations rules, (2) reclassifying Internet traffic as interstate, and (3) excluding Internet traffic from separations.

Enclosed herewith are the documents provided to and discussed with the Peter Bluhm on July 27, 1999. I have enclosed three copies of this notice and attachments in accordance with sections 1.1206(a)(1) and 1.1206(a)(2) of the Commission's rules. Please date stamp and return the provided copy in the enclosed self-addressed, stamped envelope.

Respectfully submitted,

Jean M. Pauk

Jean Pauk
Manager - Federal Affairs

Attachments

cc: Peter Bluhm
Jeff Jung
Mike Reed

No. of Copies rec'd 042
List ABCDE



Exparte Presentation on Separations Reform FCC Docket 80-286

Presented Via Conference Call
to Peter Bluhm

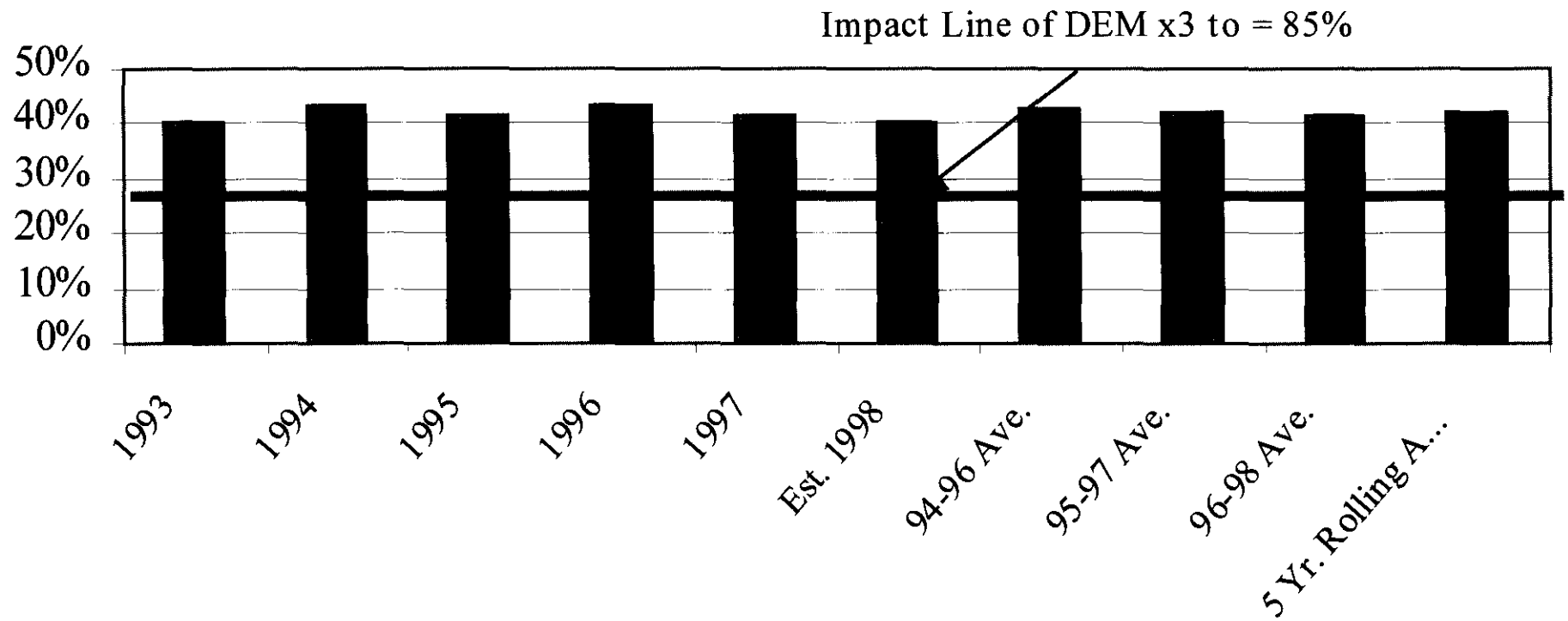
TDS TELECOM Personnel:

Mike Reed External Affairs Manager

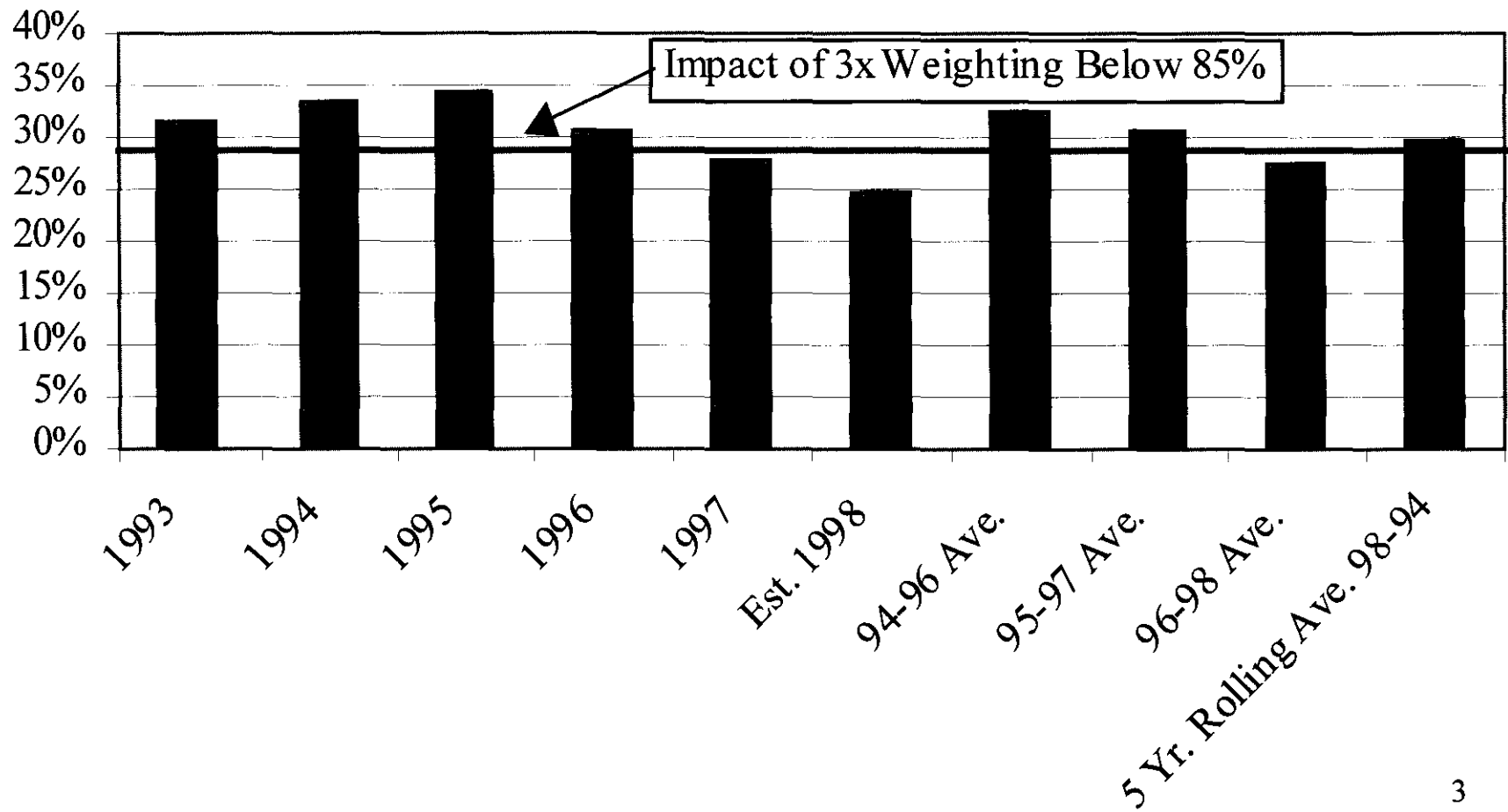
Jeff Jung Manager-Cost Analysis

Jean Pauk Manager-Federal Affairs

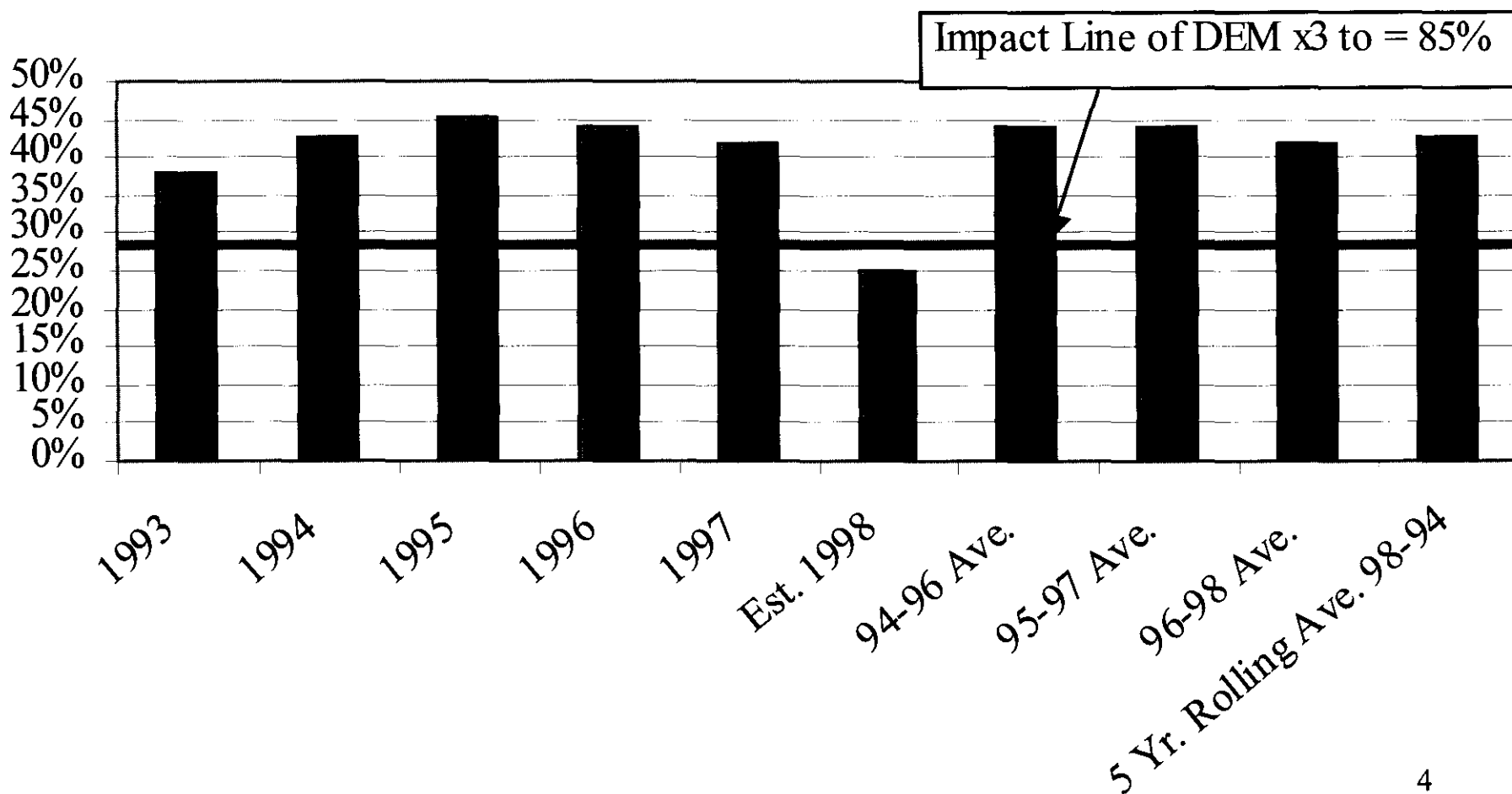
Company 1 Trend of Interstate Unweighted DEM



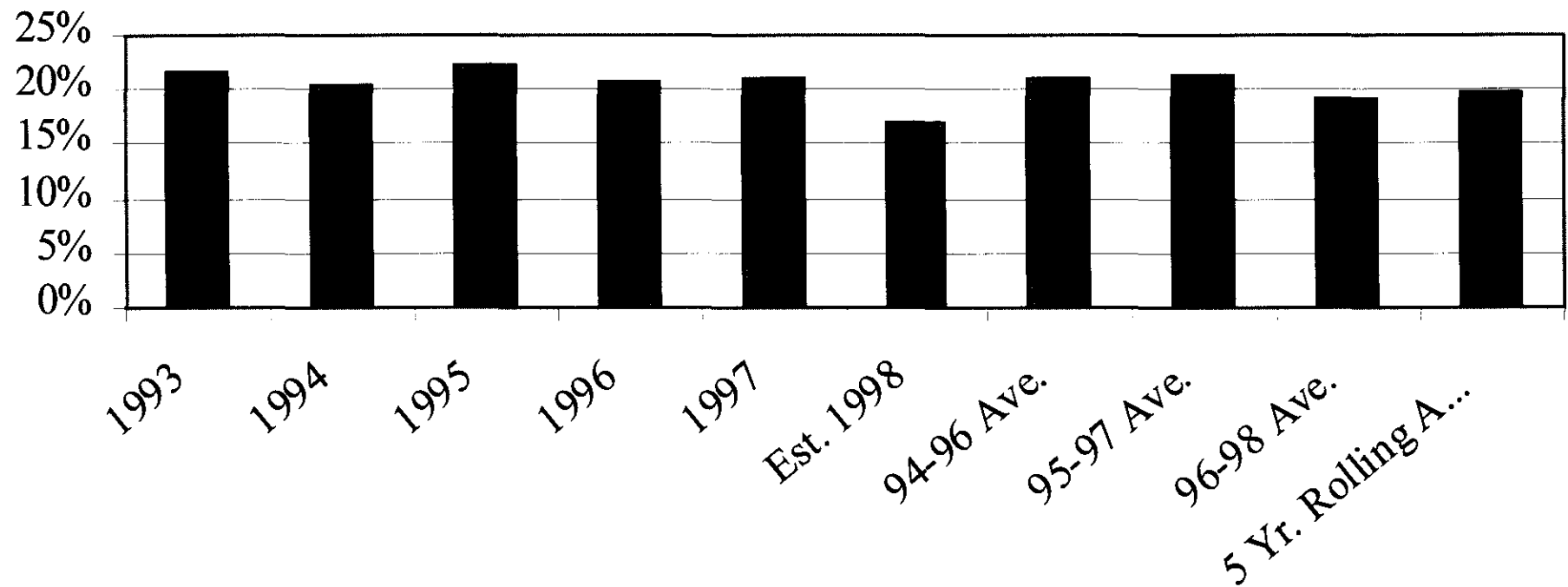
Company 2 Trend of Unweighted DEM



Company 3 Trend of Interstate Unweighted DEM

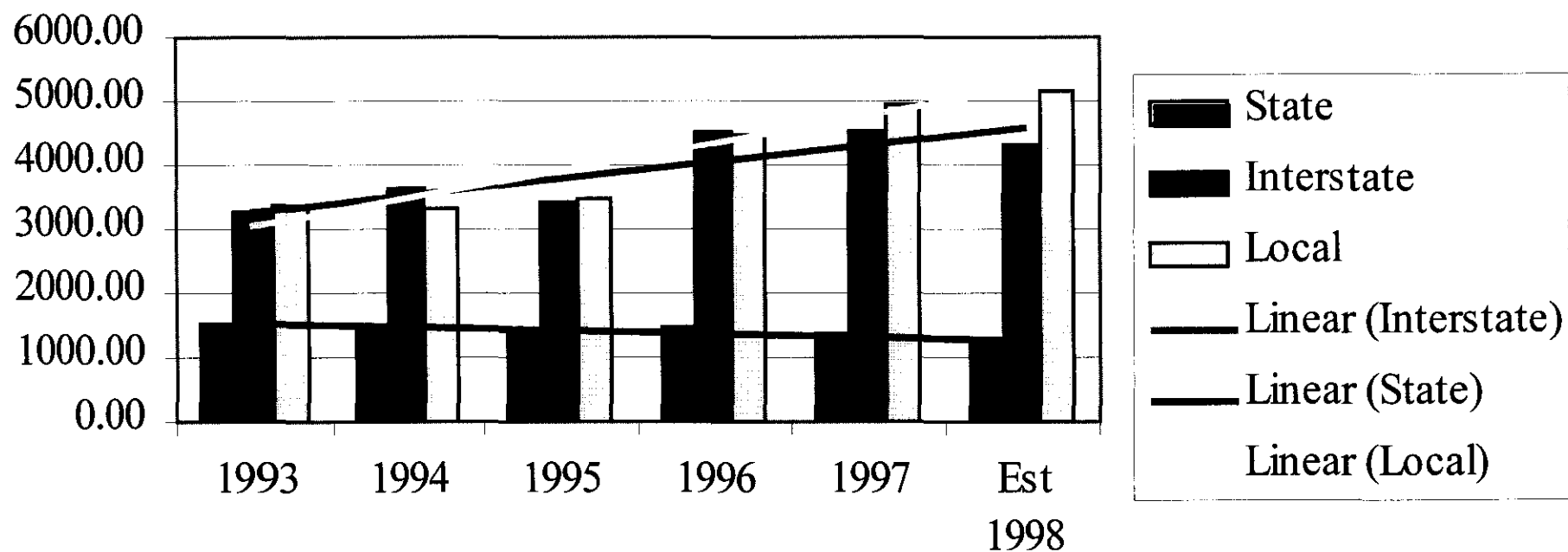


Company 4 Trend of Interstate Unweighted DEM

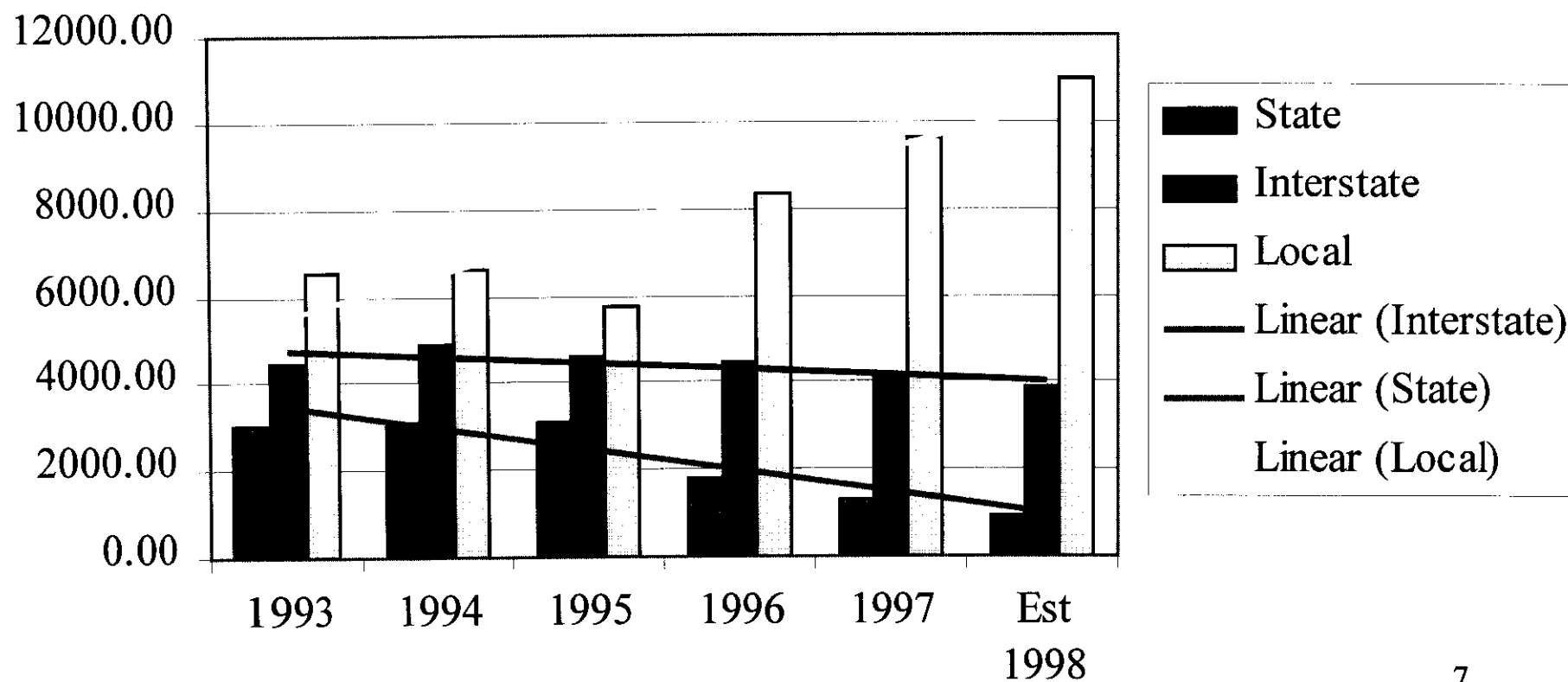




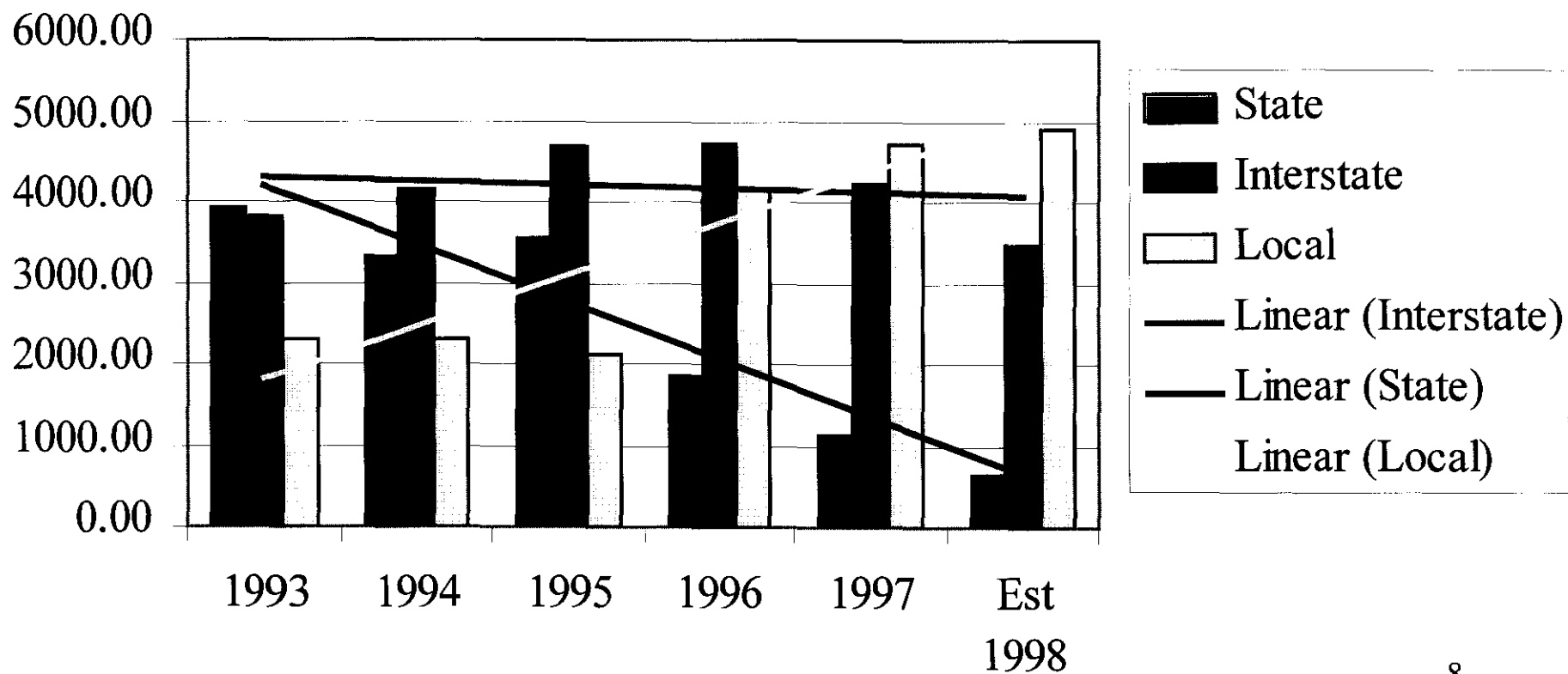
Dial Equipment Minutes Per Access Line Company 1



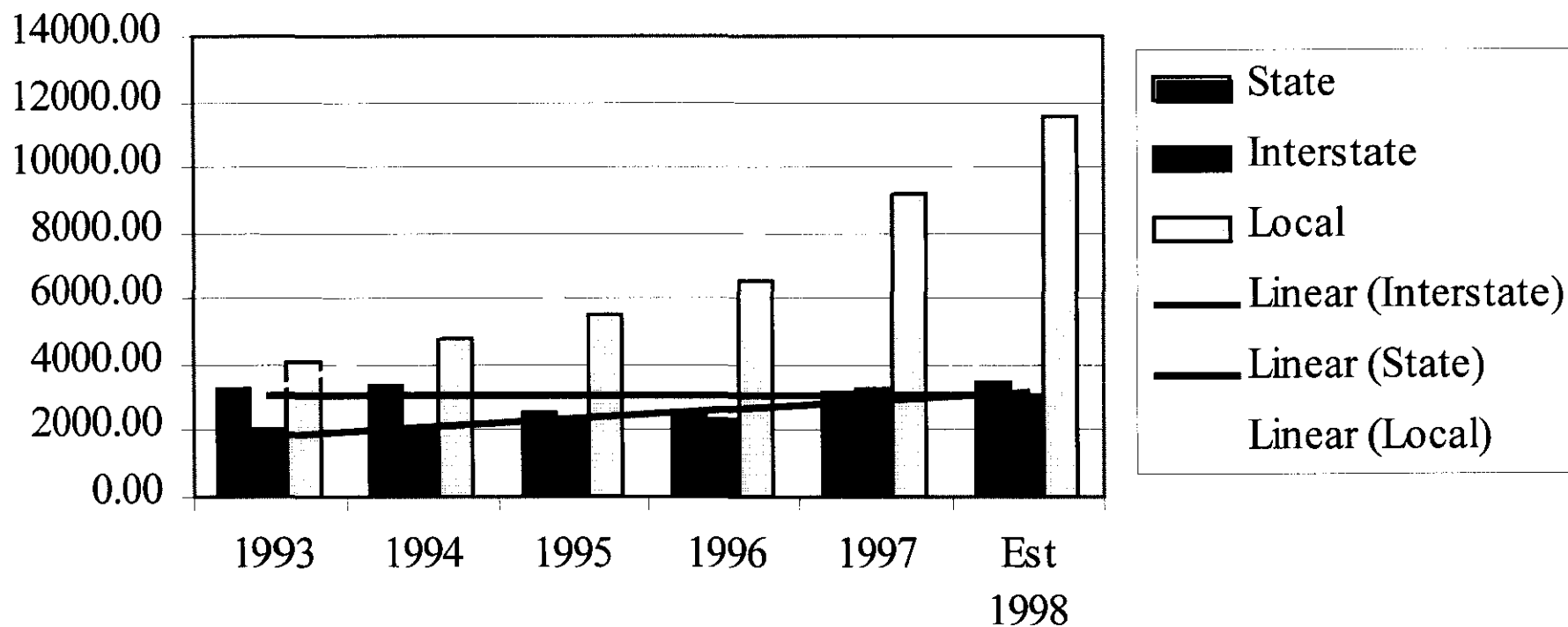
Dial Equipment Minutes Per Access Line Company 2



Dial Equipment Minutes Per Line Company 3



Dial Equipment Minutes Per Line Company 4



Impact of Internet on Interstate DEM 1998 Estimates

